

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:21 MJ 7289 SPM
	)	
PEREZ REED,	)	
	)	
Defendant.	)	

**MOTION FOR PRETRIAL DETENTION AND HEARING**

The United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and C. Ryan Finlen, Assistant United States Attorney for said District, and hereby moves the Court to order Defendant detained pending trial pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. On November 6, 2021, the United States charged Defendant by complaint with interstate transportation of a firearm with intent to commit a felony in violation of Title 18, United States Code, Section 924(b).

2. In support of its complaint, the United States included an affidavit from FBI Special Agent Kassandra L. McKenzie. As Special Agent McKenzie's affidavit explained, Defendant was the last person seen with Victim D.I. four days prior to law enforcement finding Victim D.I. shot to death. Additionally, the Defendant was the last person seen with Victim R.F. four days before law enforcement found Victim R.F. shot to death.

3. When law enforcement arrested Defendant of November 5, 2021, Defendant was in possession of a .40 caliber semi-automatic pistol. That is the same caliber of firearm that matches shell cases found at unsolved shootings across St. Louis during September 2021. At least six

victims were shot, many fatally, with the same firearm. Defendant lived in St. Louis, but had traveled from St. Louis to Kansas during when Victims D.I. and R.F. were shot in Kansas with a firearm consistent with the .40 caliber firearm used in the St. Louis shootings.

4. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against Defendant, the Defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by Defendant's release warrant Defendant's detention pending trial.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

s/ C. Ryan Finlen  
C. RYAN FINLEN, #6305918(IL)  
Assistant United States Attorney